



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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June 30, 2004

D. Chris Smith
U.S. Department of Energy
P.O. Box 550 Mailstop A3-04
Richland, WA 99352

Subject: EPA Comments on "Engineering Evaluation/Cost Analysis for the 100-K Area
Ancillary Facilities", DOE/RL-2004-43, Draft A

Dear Mr. Smith: *Chris*

The EPA has received the subject document for our review. Enclosed are our comments.
In short, it was a very good document. Please give me a call at 509-376-9884 if you have any
questions.

Sincerely,

Larry Gadbois

Larry Gadbois
100 K Area Project Manager

Cc: Jim Golden, Bechtel
Administrative Record, 100-KR-2

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EDMC

Enclosure

EPA Comments on "Engineering Evaluation/Cost Analysis for the
100-K Area Ancillary Facilities", DOE/RL-2004-43, Draft A

1) Page 1-2, second last paragraph (and a global change as needed).

In discussing the RODs, this document uses the term "removal" action. This should be "remedial" action.

2) Page 1-3, section 1.2.3

We probably need to add a discussion of the time-critical removal action for the North Loadout Pit sludge. Depending on the timing of this EE/CA and its Action Memo, we may also need to discuss the upcoming ROD amendment for the rest of the sludge.

3) Page 1-3, section 1.2.3, 1st paragraph

The last date in the paragraph – 2007 – is about to be changed to 2009. The revision to this document should reflect the latest dates in the TPA or about to go into the TPA.

4) Page 1-4, section 1.3

The document states "the EPA will prepare an action memorandum". The DOE should plan to prepare this action memorandum. (See TPA section 7.2.4, 2nd and 3rd last paragraphs. See also homer.ornl.gov/oepa/guidance/cercla/removal/rem_ch7.pdf on page 7-14, steps 2 and 3.)

Same idea applies to page 5-1. "After addressing comments, the EPADOE will document the selected removal action in an action memorandum provided to EPA for review and approval."

Please do a global search for any others.

5) Page 1-5, section 1.4 1st paragraph, last sentence

The document states "Facilities in the 100-K Area that are considered candidates for the plug-in approach are listed in Table 1-2". Please make sure absolutely no sites are overlooked and not included in this table. And just to be sure, it might be good to add an additional sentence something like "It is possible that additional 100-K Area facilities similar to those in table 1-2 may be added to this remedy as approved by EPA". For example, the pump-and-treat buildings when they are no longer needed.

6) Page 2-2, 1st full paragraph, 1st sentence

This should be revised to state: "The DOE believes the reasonably anticipated future use of the 100-K Area is preservation/conservation."

This same idea applies to page 5-9, section 5.4.8, last paragraph, 2nd sentence.

"future land use in the 100 Area is anticipated by DOE to be preservation/conservation."

Please do a global search for any others.

7) Page 2-2, 1st full paragraph

This paragraph discusses the quarter-mile buffer zone along the river. To help prevent confusion to the reader, it would be good to add that most of the facilities are not within that quarter-mile buffer zone.

8) Page 3-1, bullets at bottom page

A bullet such as the following should be added:

"Be consistent, to the extent practicable, with anticipated remedial actions if necessary at the site". (See TPA, section 7.2, last few paragraphs)

9) Page 4-3, bullets in the middle of the page.

A bullet something like the following should be added:

"When efficient to do so, remedial action will commence immediately after D&D/demolition. This will be done to eliminate the expenses involved in applying backfill to the site that will later have to be removed to perform the remedial action."

10) Page 4-3, last 2 lines

Please add the following phrase "the project removal action work plan (RAWP) provided to EPA for review and approval."

11) Page 4-4, section 4.2.3.2, 1st paragraph

This paragraph brings up the idea that in an absence of known soil contamination, the soil underlying a facility is assumed to be clean. That isn't correct for a contaminated facility, or a facility that may have had hazardous material in the past. This paragraph shouldn't make that assumption. Instead it should specify that a sampling and analysis plan will be followed to determine if the site is clean. This SAP is an element of the RAWP (either included in or a standalone appendix to the RAWP).

12) Page 4-4, section 4.2.3.2, 1st paragraph, bullets

A bullet something like "life cycle cost for the removal and remedial action" should be added.

13) Page 4-8, last paragraph

This paragraph identifies CWC and ETF as on site. I didn't see an explicit statement that ERDF is on site. ERDF should be included in the list of on site facilities.

14) Page 5-5, section 5.4.1, 1st paragraph

Suggest a change something like following change "Both alternatives would likely have short-term impacts on local Hanford Site traffic associated with transportation of waste, equipment, and personnel during the deactivation and D&D period." Note that the wait until 2030 alternative doesn't really have much short-term impact but when the job is done it will have the same impact but at that future date.

15) Page 5-8, section 5.4.7

This section doesn't appear to have followed the proper procedure (CEQ's regs) to support an

I&I claim. I&I is what you do at the end of avoid, minimize, rectify, mitigate, compensate etc. This discussion jumps right to the I&I claim.

16) Page 7-1

Please add a sentence something like the following: "A more detailed schedule for conduct of the removal action will be included in the RAWP".

17) ARARs, appendix C. I think the following are missing:

Missing TBC: DOE Order 5400.5

Missing ARAR: 10 CFR 835 (Occupational Radiation Protection)

Missing ARAR: WAC 173-480 (rad releases to air)